# **EXHIBIT 22**

#### Google Chrome

This is an archived version of the Chrome privacy notice. View the current privacy notice.

# Google Chrome Privacy Notice

Archive date: May 20, 2020

Learn how to control the information that's collected, stored, and shared when you use the Google Chrome browser on your computer or mobile device, Chrome OS, and when you enable Safe Browsing in Chrome. Although this policy describes features that are specific to Chrome, any personal information that is provided to Google or stored in your Google Account will be used and protected in accordance with the Google Privacy Policy, as changed from time to time. Google's retention policy describes how and why Google retains data.

If Google Play apps have been enabled on your Chromebook, the use and protection of information collected by Google Play or the Android operating system is governed by the <u>Google Play Terms of Service</u> and <u>Google Privacy Policy</u>. Details specific to Chrome are provided in this Notice where relevant.

#### Details about the Privacy Notice

In this Privacy Notice, we use the term "Chrome" to refer to all the products in the Chrome family listed above. If there are differences in our policy between products, we'll point them out. We change this Privacy Notice from time to time.

"Beta," "Dev," or "Canary" versions of Chrome let you test new features still being created in Chrome. This Privacy Notice applies to all versions of Chrome, but might not be up-to-date for features still under development.

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#### **Browser modes**

You don't need to provide any personal information to use Chrome, but Chrome has different modes that you can use to change or improve your browsing experience. Privacy practices are different depending on the mode that you're using.

#### Basic browser mode

The basic browser mode stores information locally on your system. This information might include:

- Browsing history information. For example, Chrome stores the URLs of pages
  that you visit, a cache of text, images and other resources from those pages,
  and, if the <u>network actions prediction</u> feature is turned on, a list of some of the
  IP addresses linked from those pages.
- Personal information and passwords, to help you fill out forms or sign in to sites you visit.
- A list of permissions that you have granted to websites.

- Data saved by add-ons.
- A record of what you downloaded from websites.

You can manage this information in several ways:

- You can delete your browsing history information.
- You can manage or delete stored browsing data from the <u>Cookies and Site</u>
   Data dialog.
- You can stop Chrome from accepting cookies. Learn more.
- You can review stored passwords in Chrome settings. Learn more.
- You can view and manage your stored Autofill information. Learn more.

The personal information that Chrome stores won't be sent to Google unless you choose to store that data in your <u>Google Account</u> by turning on sync, or, in the case of payment cards and billing information, choosing specific payment card and billing information to store in your Google Payments account. <u>Learn More</u>.

How Chrome handles your information

**Information for website operators.** Sites that you visit using Chrome will automatically receive <u>standard log information</u>, including your system's IP address and data from <u>cookies</u>. In general, the fact that you use Chrome to access Google services, such as Gmail, does not cause Google to receive any additional personally identifying information about you. On Google websites and other websites that opt in, if Chrome detects signs that you are being actively attacked by someone on the network (a "man in the middle attack"), Chrome may send information about that

with reports about attacks occurring on their sites.

Prerendering. To load web pages faster, Chrome has a setting that can look up the IP addresses of links on a web page and open network connections. Sites and Android apps can also ask the browser to preload the pages you might visit next. Preloading requests from Android apps are controlled by the same setting as Chrome-initiated predictions. But preloading instructions from sites are always performed, regardless of whether Chrome's network prediction feature is enabled. If prerendering is requested, whether by Chrome or by a site or app, the preloaded site is allowed to set and read its own cookies just as if you had visited it, even if you don't end up visiting the prerendered page. Learn more.

**Location.** To get more geographically relevant information, Chrome gives you the option to share your location with a site. Chrome won't allow a site to access your location without your permission; however, on mobile devices, Chrome automatically shares your location with your default search engine if the Chrome app has permission to access your location and you haven't blocked geolocation for the associated web site. Chrome uses Google Location Services to estimate your location. The information that Chrome sends to Google Location Services may include:

- The Wi-Fi routers closest to you
- Cell IDs of the cell towers closest to you
- The strength of your Wi-Fi or cell signal
- The IP address that is currently assigned to your device

Google doesn't have control over third-party websites or their privacy practices, so be cautious when sharing your location with a website.

**Updates.** Chrome periodically sends information to Google to check for updates, get connectivity status, validate the current time, and estimate the number of active

**Search features.** If you are signed in to a Google site and Google is your default search engine, searches you perform using the omnibox or the search box on the new tab page in Chrome are stored in your Google Account.

**Search prediction service.** To help you find information faster, Chrome uses the prediction service provided by your default search engine to offer likely completions to the text you are typing. When you search using the omnibox or the search box on the new tab page in Chrome, the characters you type (even if you haven't hit "enter" yet) are sent to your default search engine. If Google is your default search engine, predictions are based on your own search history, topics related to what you're typing in the omnibox or in the search box on the new tab page, and what other people are searching for. Learn more. Predictions can also be based on your browsing history. Learn more.

**Navigation assistance.** When you can't connect to a web page, you can get suggestions for alternative pages similar to the one you're trying to reach. In order to offer you suggestions, Chrome sends Google the URL of the page you're trying to reach.

**Autofill and password management.** In order to improve Chrome's Autofill and password management services, Chrome sends Google limited, anonymous information about the web forms that you encounter or submit while Autofill or password management is enabled, including a hashed URL of the web page and details of the form's structure. Learn more.

**Payments.** When you are signed into Chrome with your Google account, Chrome may offer to save payment cards and related billing information to your Google Payments account. Chrome may also offer you the option of filling payment cards from your Google Payments account into web forms. If you have cards saved locally in Chrome, Chrome may prompt you to save them to your Google Payments

will collect information about your computer and share it with Google Pay to protect you from fraud and provide the service. If supported by the merchant, Chrome will also allow you to pay using Google Pay.

**Language.** In order to customize your browsing experience based on the languages that you prefer to read, Chrome will keep a count of the most popular languages of the sites you visit. This language preference will be sent to Google to customize your experience in Chrome. If you have turned on Chrome sync, this language profile will be associated with your Google Account and, if you include Chrome history in your Google Web & App Activity, it may be used to personalize your experience in other Google products. View Activity Controls.

**Web Apps on Android.** On Android devices, if you select "add to homescreen" for a website that has been optimized for <u>fast, reliable performance on mobile devices</u>, then Chrome will use a Google server to create a native Android package for that website on your device. The Android package allows you to interact with the web app as you would with an Android app. For example, the web app will appear in your list of installed apps. Learn more.

**Usage statistics and crash reports.** By default, usage statistics and crash reports are sent to Google to help us improve our products. Usage statistics contain information such as preferences, button clicks, performance statistics, and memory usage. In general, usage statistics do not include web page URLs or personal information, but, if you have turned on "Make searches and browsing better / Sends URLs of pages you visit to Google", then Chrome usage statistics include information about the web pages you visit and your usage of them. If you have enabled Chrome sync, Chrome may combine any declared age and gender information from your Google account with our statistics to help us build products better suited for all demographics. For example, we may collect statistics to identify web pages that load slowly. We use this information to improve our products and services, and to give web developers insight into improving their pages. Crash

the crash report was triggered. We may share aggregated, non-personally identifiable information publicly and with partners — like publishers, advertisers or web developers. You can change whether usage statistics and crash reports are sent to Google at any time. <a href="Learn more">Learn more</a>. If Google Play apps are enabled on your Chromebook and Chrome usage statistics are enabled, then Android diagnostic and usage data is also sent to Google.

Media licenses. Some websites encrypt media to protect against unauthorized access and copying. For HTML5 sites, this key exchange is done using the Encrypted Media Extensions API. In the process of allowing access to this media, session identifiers and licenses may be stored locally. These identifiers can be cleared by the user in Chrome using Clear Browsing Data with "Cookies and other site data" selected. For sites that use Adobe Flash Access, Chrome will provide a unique identifier to content partners and websites. The identifier is stored on your system. You can deny this access in the settings under Content Settings, Protected content, and reset the ID using Clear Browsing Data with "Cookies and other site data" selected. If you access protected content in Chrome on Android, or access higher quality or offline content on Chrome OS, a content provider may ask Chrome for a certificate to verify the eligibility of the device. Your device will share a site specific identifier with the website to certify that its cryptographic keys are protected by Chrome hardware. Learn more.

**Other Google services.** This notice describes the Google services that are enabled by default in Chrome. In addition, Chrome may offer other Google web services. For example, if you encounter a page in a different language, Chrome will offer to send the text to Google for translation. You will be notified of your options for controlling these services when you first use them. You can find more information in the Chrome Privacy Whitepaper.

identifier is created in order to deliver notices to you. Where possible, we use non-unique identifiers and remove identifiers when they are no longer needed.

Additionally, the following identifiers help us develop, distribute, and promote

Chrome, but are not directly related to a Chrome feature.

- Installation tracking. Each copy of the Windows desktop version of the
  Chrome browser includes a temporary randomly generated installation number
  that is sent to Google when you install and first use Chrome. This temporary
  identifier helps us estimate the number of installed browsers, and will be
  deleted the first time Chrome updates. The mobile version of Chrome uses a
  variant of the device identifier on an ongoing basis to track the number of
  installations of Chrome.
- Promotion tracking. In order to help us track the success of promotional campaigns, Chrome generates a unique token that is sent to Google when you first run and use the browser. In addition, if you received or reactivated your copy of the desktop version of the Chrome browser as part of a promotional campaign and Google is your default search engine, then searches from the omnibox will include a non-unique promotional tag. All mobile versions of the Chrome browser also include a non-unique promotional tag with searches from the omnibox. Chrome OS may also send a non-unique promotional tag to Google periodically (including during initial setup) and when performing searches with Google. Learn more.
- Field trials. We sometimes conduct limited tests of new features. Chrome
  includes a seed number that is randomly selected on first run to assign
  browsers to experiment groups. Experiments may also be limited by country
  (determined by your IP address), operating system, Chrome version, and other
  parameters. A list of field trials that are currently active on your installation of
  Chrome is included in all requests sent to Google. Learn more.

**Sign in on Desktop.** On desktop versions of Chrome, signing into or out of any Google web service, like google.com, signs you into or out of Chrome. You can turn this off in settings. Learn more. If you are signed in to your Google Account on desktop, Chrome may offer to save your payment cards and related billing information to your Google Payments account. This personal information will be used and protected in accordance with the Google Privacy Policy.

**Sync.** When you sign in to the Chrome browser or a Chromebook and enable sync with your <u>Google Account</u>, your personal information is saved in your Google Account on Google's servers so you may access it when you sign in and sync to Chrome on other computers and devices. This personal information will be used and protected in accordance with the <u>Google Privacy Policy</u>. This type of information can include:

- Browsing history
- Bookmarks
- Tabs
- Passwords and Autofill information
- Other browser settings, like installed extensions

Sync is only enabled if you choose. <u>Learn More</u>. To customize the specific information that you have enabled to sync, use the "Settings" menu. <u>Learn more</u>. You can see the amount of Chrome data stored for your Google Account and manage it on the <u>Data from Chrome sync Dashboard</u>. On the Dashboard, except for Google Accounts created through Family Link, you can also disable sync and delete all the associated data from Google's servers. <u>Learn more</u>. For Google Accounts created in Family Link, sign-in is required and sync cannot be disabled because it provides parent management features, such as website restrictions. However, children with Family Link accounts can still delete their data and disable synchronization of most data types. <u>Learn More</u>. The <u>Privacy Notice for Google Accounts created in Family Link</u> applies to Chrome sync data stored in those accounts.

When you enable sync with your Google Account, we use your browsing data to improve and personalize your experience within Chrome. You can also personalize your experience on other Google products, by allowing your Chrome history to be included in your Google Web & App Activity. Learn more.

You can change this setting on your <u>Account History</u> page or <u>manage your private</u> <u>data</u> whenever you like. If you don't use your Chrome data to personalize your Google experience outside of Chrome, Google will only use your Chrome data after it's anonymized and aggregated with data from other users. Google uses this data to develop new features, products, and services, and to improve the overall quality of existing products and services. If you would like to use Google's cloud to store and sync your Chrome data but you don't want Google to access the data, you can encrypt your synced Chrome data with your own sync passphrase. Learn more.

#### Incognito mode and guest mode

You can limit the information Chrome stores on your system by using incognito mode or guest mode. In these modes, Chrome won't store certain information, such as:

- Basic browsing history information like URLs, cached page text, or IP
   addresses of pages linked from the websites you visit
- Snapshots of pages that you visit
- Records of your downloads, although the files you download will still be stored elsewhere on your computer or device

How Chrome handles your incognito or guest information

**Cookies.** Chrome won't share existing cookies with sites you visit in incognito or guest mode. Sites may deposit new <u>cookies</u> on your system while you are in these modes, but they'll only be stored and transmitted until you close the last incognito or guest window.

information is saved. These changes are not affected by incognito or guest mode.

**Permissions.** Permissions you grant in incognito mode are not saved to your existing profile.

**Profile information.** In incognito mode, you will still have access to information from your existing profile, such as suggestions based on your browsing history and saved passwords, while you are browsing. In guest mode, you can browse without seeing information from any existing profiles.

## Managing Users in Chrome

#### Managing users for personal Chrome use

You can set up personalized versions of Chrome for users sharing one device or computer. Note that anyone with access to your device can view all the information in all profiles. To truly protect your data from being seen by others, use the built-in user accounts in your operating system. Learn more.

#### Managing users on Chrome for Enterprise

Some Chrome browsers or Chromebooks are managed by a school or company. In that case, the administrator has the ability to apply policies to the browser or Chromebook. Chrome contacts Google to check for these policies when a user first starts browsing (except in guest mode). Chrome checks periodically for updates to policies.

An administrator can set up a policy for status and activity reporting for Chrome, including location information for Chrome OS devices. Your administrators may also

### Safe Browsing practices

Google Chrome and certain third-party browsers, like some versions of Mozilla Firefox and Apple's Safari, include Google's Safe Browsing feature. With Safe Browsing, information about suspicious websites is sent and received between the browser you are using and Google's servers.

#### How Safe Browsing works

Your browser contacts Google's servers periodically to download the most recent "Safe Browsing" list, which contains known phishing and malware sites. The most recent copy of the list is stored locally on your system. Google doesn't collect any account information or other personally identifying information as part of this contact. However, it does receive <a href="standard log information">standard log information</a>, including an IP address and cookies.

Each site you visit is checked against the Safe Browsing list on your system. If there's a match, your browser sends Google a hashed, partial copy of the site's URL so that Google can send more information to your browser. Google cannot determine the real URL from this information. Learn more.

The following Safe Browsing features are specific to Chrome:

If you have turned on Safe Browsing's Enhanced Protection mode, Chrome
provides additional protections, and sends Google additional data, as
described in Chrome settings. <u>Learn more</u>. Some of these protections may
also be available as standalone features, subject to separate controls, where
Standard Protection is enabled.

Google the full URL of each site you visit to determine whether that site is safe. If you also sync your browsing history without a sync passphrase, these URLs will be temporarily associated with your Google account to provide more personalized protection. This feature is disabled in incognito and guest modes.

- Some versions of Chrome feature Safe Browsing technology that can identify
  potentially harmful sites and potentially dangerous file types not already
  known by Google. The full URL of the site or potentially dangerous file might
  also be sent to Google to help determine whether the site or file is harmful.
- Chrome uses Safe Browsing technology to scan your computer periodically, in
  order to detect unwanted software that prevents you from changing your
  settings or otherwise interferes with the security and stability of your browser.
  <u>Learn more</u>. If this kind of software is detected, Chrome might offer you the
  option to download the Chrome Cleanup Tool to remove it.
- You can choose to send additional data to help improve Safe Browsing when you access a site that appears to contain malware or when Chrome detects unwanted software on your computer. Learn more.
- If you use Chrome's password manager, Safe Browsing checks with Google when you enter any saved password on an uncommon page to protect you from phishing attacks. Chrome does not send your passwords to Google as part of this protection. In addition, Safe Browsing protects your Google Account password. If you enter it on a likely phishing site, Chrome will prompt you to change your Google Account password. If you sync your browsing history, or if you are signed in to your Google Account and choose to notify Google, Chrome will also flag your Google Account as likely phished.
- If you are signed in to your Google Account, Chrome will also warn you when you use a username and password that may have been exposed in a data

and Google returns a list of possible matches from known breaches. Chrome uses this list to determine whether your username and password were exposed. Google does not learn your username or password, or whether they were exposed, as part of this process. This feature can be disabled in Chrome settings. Learn more.

On desktop and Android versions of Chrome, you can always choose to <u>disable</u>
 the Safe Browsing feature within Chrome settings. On iOS versions of Chrome,
 Apple controls the Safe Browsing technology used by your device and may
 send data to Safe Browsing providers other than Google.

# Privacy practices of apps, extensions, themes, services, and other add-ons

You can use apps, extensions, themes, services and other add-ons with Chrome, including some that may be preinstalled or integrated with Chrome. Add-ons developed and provided by Google may communicate with Google servers and are subject to the <u>Google Privacy Policy</u> unless otherwise indicated. Add-ons developed and provided by others are the responsibility of the add-on creators and may have different privacy policies.

#### Managing add-ons

Before installing an add-on, you should review the requested permissions. Add-ons can have permission to do various things, like:

- Store, access, and share data stored locally or in your Google Drive account
- · View and access content on websites you visit
- Use notifications that are sent through Google servers

Chrome can interact with add-ons in a few different ways:

Sending usage indicators to Google about the add-ons

Some add-ons might require access to a unique identifier for digital rights management or for delivery of push messaging. You can disable the use of identifiers by removing the add-on from Chrome.

From time to time, Google might discover an add-on that poses a security threat, violates the developer terms for Chrome Web Store, or violates other legal agreements, laws, regulations, or policies. Chrome periodically downloads a list of these dangerous add-ons, in order to remotely disable or remove them from your system.

#### Server Log Privacy Information

Like most websites, our servers automatically record the page requests made when you visit our sites. These "server logs" typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

Here is an example of a typical log entry for where the search is for "cars" looks like this, followed by a breakdown of its parts:

```
123.45.67.89 - 25/Mar/2003 10:15:32 - https://www.google.com/search? q=cars - Firefox 1.0.7; Windows NT 5.1 - 740674ce2123e969
```

- 123.45.67.89 is the Internet Protocol address assigned to the user by the
  user's ISP. D; depending on the user's service, a different address may be
  assigned to the user by their service provider each time they connect to the
  Internet.;
- 25/Mar/2003 10:15:32 is the date and time of the query.;

- Firefox 1.0.7; Windows NT 5.1 is the browser and operating system being used.;
- 740674ce2123a969 is the unique cookie ID that was assigned to this particular computer the first time it visited a Google site. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time they've/s/he visited Google, then it will be the unique cookie ID assigned to their device the user the next time theys/he visits Google from that particular computer).

### More information

Information that Google receives when you use Chrome is used and protected under the <u>Google Privacy Policy</u>. Information that other website operators and add-on developers receive, including <u>cookies</u>, is subject to the privacy policies of those websites.

Google complies with certain <u>legal frameworks</u> relating to the transfer of data, such as the EU-US and Swiss-US Privacy Shield Framework. <u>Learn more</u>.

## **Key Terms**

#### Cookies

A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the site again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can configure your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not

#### Google Account

You may access some of our services by signing up for a <u>Google Account</u> and providing us with some personal information (typically your name, email address and a password). This account information is used to authenticate you when you access Google services and protect your account from unauthorized access by others. You can edit or delete your account at any time through your Google Account settings.